



**SDMS Doc ID 2027955**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

December 15, 2003

Luis Marmol  
c/o Design Curves  
824 W. 18<sup>th</sup> Street  
Costa Mesa, CA 92627

Keith Farrell, Designated Project Coordinator  
Meredith & Associates, Inc.  
9841 Airport Blvd., Suite 1010  
Los Angeles, CA 90045

**Re: Dico Oil - Comments to Supplement #6, dated December 11, 2003.  
EPA Unilateral Administrative Order (UAO) 9-2003-14**

Please address the following comments to Supplement #6. Your responses may be submitted electronically and/or in writing, with the understanding that the responses are fully incorporated into the Supplement #6 document.

Comments to the Soil Sampling Plan, dated December 10, 2003 will be submitted separately. In addition, I look forward to receipt of the proposed project timeline, including all remaining significant project tasks.

## **2.0 VOC IMPACTED SOIL**

The South Coast Air Quality Management District (SCAQMD) Rule 1166 - "Volatile Organic Compound Emissions from Decontamination of Soil" is an "applicable or relevant and appropriate requirement (ARAR) as provided at 40 CFR 300.415(j). Provide a more comprehensive discussion on the manner in which Rule 1166 criteria will be addressed including, site specific VOC action levels, reporting/documentation requirements (if any), and emission control techniques. Specific Rule 1166 citations should be used as cross-references.

Specify whether the "List of Method Detection and Reporting Limits Soil Matrix Analysis" for 8260B in Table 2 of Appendix A (QAPP) is meant to be the VOC Target Analyte List for this project.

#### **4.1 ROLL-OFF BINS**

Specify the use of SW-846 Method 8260B. If Method 8260A is to be used, discuss reason. Specify which of the SW-846 Method 5035 sampling and preservation techniques will be used (i.e., pre-weighed VOA vial containing sodium bisulfate preservation solution or methanol) and indicate only the chosen technique in Table 1.

#### **5.0 QUALITY ASSURANCE PROGRAM PLAN (QAPP)**

Reference to Appendix A

##### **6.1 QUALITY CONTROL PROCEDURES**

With the exception of field duplicate samples, information associated with the “collection and laboratory analysis of appropriate field equipment and trip blanks to monitor for contamination of samples in the field or in the laboratory, and collection and laboratory analysis of matrix spike, matrix spike duplicates to evaluate precision and accuracy” is not carried forward in Supplement #6, Section 5.0. Indicate (in Supplement #6) the limits of the field QA/QC program as compared against the broader program contained in the Appended QAPP.

##### **9.3 PROCEDURES FOR DATA VALIDATION**

Is it the intention of Meredith & Associates, Inc., to perform a data validation consistent with the National Functional Guidelines?

Sincerely,

Craig Benson  
U.S. EPA  
Federal On-Scene Coordinator  
200 Oceangate, Suite 900  
Long Beach, CA 90802

cc: Elizabeth Cox, ORC